UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

June 20, 2005

Thomas Macchiarella
BRAC Operations, Code 06CA.TM
Department of the Navy, Southwest Division
Naval Facilities Engineering Command
1230 Columbia Street, Suite 1100
San Diego, CA 92101

RE: **Draft Final Remedial Investigation Report, Operable Unit 2B, Sites 3, 4, 11 and 21 Alameda Point**

Dear Mr. Macchiarella:

EPA has reviewed the above referenced document, prepared by Tetra Tech EM Inc and submitted by the Navy on May 16, 2005. A major improvement in the draft final document is the revised risk assessment which, in response to EPA's request, carries all useable data through the risk calculations without screening out any contaminants. However, there are still some areas where the Remedial Investigation falls short and these problems will need to be addressed prior to issuance of the draft final Feasibility Study and the Record of Decision. Some additional information will also be gathered during the Remedial Design and Remedial Action phase of the clean up for this operable unit that will further refine issues related to groundwater contamination.

Although the risk assessment is more thorough in the draft final document, it is still limited by the lack of soil data taken beneath most existing buildings and by the high detection limits that characterize much of the older data. In addition, sampling beneath and around many solid waste management units (SWMUs) has not been performed and this data is necessary to form the basis for addressing the SWMUs as part of the ROD. EPA therefore believes that soil risk at the site is still likely underestimated and that the nature and extent of soil contamination is also incomplete. To rectify these problems, EPA requests that the Navy collect soil data beneath all SWMUs and incorporate the results of the sampling into either the draft or the draft final Feasibility Study. To address the potential problem of contaminated soil beneath existing buildings, EPA requests carrying the question of the soil under the buildings into the FS and evaluating a remedy for the soil beneath the buildings such as Institutional Controls that prohibits removal of the buildings and thus prevents exposure to the soil beneath the buildings.

In terms of the human health risk assessment for groundwater, EPA believes that there is sufficient information in the RI to develop reasonable alternatives in the FS to clean up the groundwater for the purpose of protecting human health, although we recognize that the complete

nature and extent of the groundwater contamination will have to be determined at the RD/RA stage. However, the ecological risk assessment which determines the impact of groundwater contamination on aquatic receptors in the Seaplane Lagoon is inadequate. To solve this problem, the Navy has agreed to install five additional monitoring wells within 50 feet of the eastern boundary of the Seaplane Lagoon, within Operable Unit 2B and inland of the existing seawall. The wells will become part of the Basewide Groundwater Monitoring Program and will be installed and sampled as soon as funds are available. The monitoring data will enable the Navy and regulators to determine whether there is any immediate or potential impact to aquatic receptors in the Seaplane Lagoon.

In order to maintain our progress at these sites, and based on the expectation that the Navy will address our concerns as outlined in this letter, EPA agrees to finalization of this Remedial Investigation Report for OU 2B.

We look forward to working with you on the Feasibility Study Report. If you have any questions, please contact me at (415) 972-3029.

Sincerely,

Anna-Marie Cook

Anna-Marie Cook
Remedial Project Manager
Federal Facility Cleanup Branch

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